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25 **UNITED STATES DISTRICT COURT**
26 NORTHERN DISTRICT OF CALIFORNIA

27 ANIBAL RODRIGUEZ, SAL
 28 CATALDO, JULIAN
 19 SANTIAGO, and SUSAN LYNN
 20 HARVEY, individually and on behalf of all
 21 others similarly situated,

22 Plaintiffs,

23 vs.

24 GOOGLE LLC,

25 Defendant.

26 Case No.: 3:20-cv-04688

27 **SECOND DECLARATION OF MARK**
28 MAO IN SUPPORT OF PLAINTIFFS'
RULE 15(a) MOTION FOR LEAVE TO
AMEND COMPLAINT

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Date: December 8, 2022
 Time: 1:30 P.M.

DECLARATION OF MARK MAO

I, Mark Mao, declare as follows:

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in further support of Plaintiffs' Rule 15(a) Motion for Leave to Amend Complaint.

3. Attached hereto as **Exhibit 34** is a true and correct copy of Google's Responses and Supplemental Responses to Interrogatory Nos. 12 and 15, which Google served on October 31, 2022.

4. Attached hereto as **Exhibit 35** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00203545. This document was produced on November 11, 2022.

5. Attached hereto as **Exhibit 36** are true and correct copies of excerpts from a document that Google produced in discovery labeled GOOG-RDGZ-00060716. This document was produced on October 22, 2021.

6. Attached hereto as **Exhibit 37** is a true and correct copy of Google's Fourth Supplemental Response to Interrogatory No. 1, which Google served on November 5, 2021.

7. Attached hereto as **Exhibit 38** are true and correct excerpts from the transcript of the October 25, 2022 deposition of Google employee Eric Miraglia.

8. Attached hereto as **Exhibit 39** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00203679. This document was produced on November 21, 2022.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 21st day of November, 2022, at San Francisco, California.

/s/ Mark Mao